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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television Broadcast)
Stations)
)
Reevaluation of the UHF Television)
Channel and Distance Separation)
Requirements of Part 73 of the)
Commission's Rules)

MM Docket No. 87-268/
RM-5811

TO: The Commission

COMMENTS OF AMERICAN FAMILY BROADCAST GROUP, INC.

American Family Broadcast Group, Inc. ("American Family"), by its attorneys, hereby submits its Comments in the above-captioned proceeding. 1/ The Commission is to be commended for the comprehensive approach reflected in its Notice of Inquiry ("NOI"). As the NOI makes clear, the American broadcast television industry now stands poised on the threshold of technological advance unprecedented in its

1/ American Family, through its subsidiaries, owns and operates commercial television stations in Waterloo and Sioux City, Iowa (KWVL and KTIV, respectively); Savannah, Georgia (WTOG-TV); Huntsville, Alabama (WAFF); Washington, North Carolina (WITN-TV); and Cape Girardeau, Missouri (KFVS-TV).

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forty-year history. Neither the industry nor the Commission, however, can afford to be spellbound by the mere image of a national high definition broadcast television system, dazzling as it is. Rather, both must work side-by-side to preserve the important role of local broadcasters in the approaching era of advanced television services. Specifically, for the reasons detailed below, steps must be taken immediately to ensure that over-the-air delivery of a substantially enhanced 6 MHz television signal compatible with existing receivers will be possible by the close of this decade.

I. THE COMMISSION MUST ACT TO PRESERVE THE VIABILITY OF AMERICA'S LOCAL BROADCAST TELEVISION SYSTEM.

Japan's government-subsidized NHK, the developer of the much-publicized "MUSE" high definition television ("HDTV") system, recently announced its intention to provide service to the United States via satellite by 1990, thus making it possible for American consumers willing to purchase MUSE-compatible television receivers 2/ to experience

2/ The National Association of Broadcasters ("NAB") estimates that between one and two million MUSE-ready television receivers will have been purchased by American consumers by the middle of 1992. That number can be expected to grow quickly as the cost of equipment comes down and the dramatically improved quality of the MUSE picture becomes widely appreciated by the public. High-definition video-discs are also expected to be available by 1990, as are inexpensive MUSE-to-NTSC converters. The converted picture, while not high-definition, will be somewhat

HDTV's remarkable clarity at home via cable or direct broadcast satellite ("DBS"). HDTV-produced programming also will be readily available to such nonbroadcast video delivery systems in ever-increasing quantity over the next few years. 3/

The planned introduction of the MUSE system in Japan contemplates a two-tier television system by which HDTV service will be provided via satellite and non-HDTV service by conventional over-the-air broadcasters. Evolution into such a bifurcated system is not surprising in Japan, which operates under a federal system where there are no local governments and where broadcasters lack the historic commitment of American broadcasters to serve local needs and interests. In the United States, on the other hand, introduction of the MUSE system, without the capability on the part of conventional broadcasters to provide HDTV service of equivalent quality, would have a devastating effect on local broadcasters. Because of the bandwidth requirements of MUSE (8.1 MHz), conventional broadcasters are precluded from providing MUSE signals over the narrower NTSC channels.

2/ (Cont'd.)
better than today's NTSC image. See "High Definition Television: Getting the Picture," Broadcasting, October 26, 1987, p. 70.

3/ As widely reported, HDTV equipment is already in use at two production studios in New York City, as well as others in Canada and Tokyo. Moreover, every motion picture made on 35mm film is ideally suited to delivery via MUSE or any other widened single-channel HDTV system. See "HDTV", Broadcasting, October 26, 1987 at 64.

If free local broadcast television is to remain viable, American broadcasters must be able to compete in terms of signal quality with MUSE from the outset of its introduction in this country just two short years from now. If they are not given the means to do so, American Family fears that HDTV will evolve into a premium service accessible only to that portion of the population able to afford cable, satellite or home video subscriptions and equipment. Moreover, the "cream-skinning" effect that such a development would produce eventually would erode the economic base of local television stations and preclude their production of locally-g geared programming. As the National Association of Broadcasters ("NAB") and the Association of Maximum Service Telecasters ("AMST") explain in their separate Comments in this proceeding, such a result clearly would not serve the public interest. Indeed, it would prove antithetical to the fundamental premises of the Commission's channel allocation policies and inimical to its charter. 4/

4/ By contrast, national satellite delivery of HDTV in Japan is entirely consistent with that country's centrist broadcast philosophy. As noted above, local broadcast is not now, and has never been, a significant part of the Japanese national plan. Thus, the demotion of over-the-air transmission to a strictly non-HDTV programming medium will do no violence to Japan's governmental and social objectives. The same clearly cannot be said of the United States.

II. NBC'S "ACTV" DELIVERY SYSTEM IS IDEALLY SUITED
TO MEET THE SHORT-TERM NEEDS OF LOCAL BROADCAST
TELEVISION IN THIS COUNTRY.

In addition to providing a video signal comparable in quality to MUSE, American Family believes that whatever system the Commission selects to permit broadcasters to compete effectively in the next decade initially also must require no more than the 6 MHz of spectrum now allotted to broadcast channels, and that it must permit American viewers to receive at least an NTSC-grade signal on their existing television receivers.

First, with respect to spectrum requirements, American Family is not opposed to the ultimate use of presently fallow UHF channels to provide the so-called "augmentation channels" necessary to make North American Philips' and the New York Institute of Technology's experimental HDTV systems feasible. However, American Family is concerned that the substantial technical changes and investment necessary to make the operation of such systems feasible will take far longer than the two or three year period left to broadcasters before MUSE descends from American skies. Moreover, as NAB and AMST thoroughly document in their Comments, it simply is not yet possible to intelligently select a true HDTV transmission standard from among the many theoretical proposals now before the Commission.

Second, for equally practical reasons, American Family also believes that short-term improvement in broadcast

signal quality, dramatic as it may be, should not force consumers to discard their existing NTSC television receivers. AMST has estimated that Americans own 130 million television sets valued at over \$80 billion. 5/ Assuming, as is likely, that an enhanced television receiver will cost a minimum of \$1000, many Americans simply will be unable to replace their present NTSC sets even if compelled to do so. Broadcasters, therefore, could be presented with the Hobson's choice of blacking out a good portion of their viewers in order to bring enhanced service to the financially better off portions of their audiences, or to forego the improvement of their signals in order to retain a larger number of viewers and broader demographics. 6/

Fortunately for American television, American Family's requirements for a flexible and rapidly deployable enhanced television system do not constitute a mere wish-list. To the contrary, the single-channel system recently unveiled by NBC's David Sarnoff Research Center, "ACTV", shows great promise of meeting the immediate, and perhaps ultimate, needs of American broadcasters. Developed over the past ten years at a cost, thus far, of \$45 million, ACTV would deliver a high-

5/ See Broadcasting, October 26, 1987, supra.

6/ The biggest losers under either scenario, of course, are those viewers who cannot afford pay-TV services, like cable and DBS, which will provide HDTV programming by the end of the decade.

resolution picture comprised of 1,050 scan lines with an aspect ratio of 5 to 3 in just 6 MHz of spectrum. Moreover, an ACTV broadcast could be received with NTSC-level picture quality on any existing television receiver without the need for a converter of any kind. Perhaps most encouraging of all, ACTV will be off the computer "drawing board" and into actual television hardware ready for over-the-air trials by mid-1988. If all goes well, ACTV receivers capable of reaping the system's full benefits could be on retailer's shelves in 1990 or 1991 side-by-side with Japanese MUSE-compatible equipment. With the Commission's and the broadcast industry's cooperation, 7/ therefore, ACTV may well keep free local broadcasting where it always was intended to be: at the center of every American home.

III. DEVELOPMENT AND IMPLEMENTATION OF TRUE HIGH DEFINITION TELEVISION MUST REMAIN A TOP NATIONAL PRIORITY.

American Family's vigorous advocacy of the rapid development and implementation of a 6 MHz advanced television system compatible with existing NTSC receivers should not be taken to imply that it regards American-generated high definition television as either undesirable or unachievable.

7/ American Family has offered to make a substantial financial commitment to NBC to facilitate the testing and perfection of the ACTV system over the next three years and encourages other broadcasters to do likewise.

Nothing, in fact, could be further from the truth. American Family sincerely hopes that it will be possible for NBC and other researchers to achieve true HDTV within a single independent 6 MHz channel. American Family also is mindful, however, that additional spectrum ultimately may be the only means by which true HDTV can be delivered over-the-air by local broadcasters to the nation's living rooms. As NAB and AMST point out in their Comments, it is simply too soon to tell. American Family respectfully suggests, therefore, that the Commission permit the scientific community to work without fear that spectrum it may need to fulfill HDTV's promise will be allocated prematurely and imprudently to a competing terrestrial or satellite service. As the Commission itself recently observed, "[T]he future of television technology is a matter of great importance and . . . we must have an adequate body of knowledge on which to base our decisions before foreclosing any options." 8/

8/ See Further Sharing of UHF Television Band, FCC 87-327, released October 21, 1987 at 2.

CONCLUSION

American Family is committed, both financially and philosophically, to making true high definition television service an integral part of local broadcasting in this country. It strongly believes that to accomplish that goal, however, interim steps must be taken to ensure that local broadcasters retain the ability to be a part of American high definition television. Accordingly, American Family urges the Commission to embrace and implement ACTV, the best enhanced television system now realistically available, while simultaneously preserving such frequencies as may be necessary in the future to provide true over-the-air HDTV to all Americans.

Respectfully submitted,

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